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June 18, 2020

VIA ELECTRONIC FILING

C. Joanne Wessinger-Hill, Esquire **Public Service Commission of South Carolina**101 Executive Center Drive, Suite 100

Columbia, South Carolina 29210

RE: Friends of the Earth and Sierra Club, Complainant/Petitioner v. South Carolina Electric & Gas Company, Defendant/Respondent Docket No. 2017-207-E

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920 Docket No. 2017-305-E

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans Docket No. 2017-370-E

Actions in Response to COVID-19 Docket No. 2020-106-A

Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges (See Commission Order No. 2020-313) Docket No. 2020-125-E

Dear Ms. Wessinger-Hill:

I am writing on behalf of Dominion Energy South Carolina, Inc ("DESC" or "Company") and the South Carolina Office of Regulatory Staff ("ORS") in response to your email dated June 5, 2020, in which you requested comments regarding the

procedural schedule for DESC's next retail electric rate case. DESC and ORS recently concluded discussions on this topic, and we are pleased to present a joint proposed schedule for the Commission's consideration.

The joint proposed schedule provided herein is based upon the assumption that DESC will file its rate case application on Friday, August 14, 2020, with an effective date of August 15, 2020; however, DESC and ORS, for the reasons set forth below, do not interpret Commission Order No. 2020-313 to require that DESC file its rate case application on August 14, 2020, with an effective date of August 15, 2020.

When the Commission issued Order No. 2018-804, it instructed DESC to file an electric rate case "no earlier than May 1, 2020," to ensure that actual merger savings are reflected in retail electric rates "effective January 1, 2021." (emphasis supplied). DESC's April 1, 2020, letter requested an approximately sixty-day postponement of the effective date for new rates go into effect, from January 1, 2021, until the first billing cycle of March of that year, to allow the filing of the required rate case application to be delayed until August 15, 2020. In response to this request, Order No. 2020-313 stated:

Dominion will not be required to file for electric rate relief on May 1, 2020, nor will Dominion be required to place new rates, if any, in effect on January 1, 2021, as previously ordered by Commission Order No. 2018-804 and other Commission Orders. The original Order language requiring these actions by the listed dates is hereby vacated, as is language in any other orders of this Commission concerning the filing date for this electric rate case and the effective date of any new rates.

Order No. 2020-313 at p. 3.

As DESC and ORS read this language, Order No. 2020-313 mooted DESC's request to postpone the effective date of the rates, and by inference the filing date for the application. Indeed, Order No. 2020-313 withdrew all requirements under Order No. 2018-804 concerning filing dates or effective dates. Therefore, DESC and ORS do not understand there to be any obligation for DESC to file a rate case application on August 15, 2020, or on any other date.

If the Commission has a different understanding of the intent of Order No. 2020-313 and believes that DESC is under an obligation to file a rate case on a particular date, a directive or other instruction clarifying that intent would be greatly appreciated. At this time, DESC has not made a definitive commitment to file a rate case on August 15, 2020, or on any other date.

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If a rate case application is to be filed on August 14, 2020, with an effective date of August 15, 2020, then DESC and ORS would propose that the Commission adopt the joint schedule set forth below.

- 1. DESC must prefile its direct testimony and exhibits of the witnesses it intends to present and serve the testimony and exhibits of the witnesses on all Parties of Record on or before **September 4, 2020**.
- 2. All Other Parties of Record and ORS must prefile its direct testimony and exhibits of the witnesses they intend to present and serve the testimony and exhibits of the witnesses on all Parties of Record on or before **November 10, 2020**.
- 3. Discovery shall end on **November 17, 2020**, and no Party of Record may serve discovery upon another Party of Record after this date. If, however, ORS has any questions regarding any discovery responses received after **November 17, 2020**, then the Parties shall work together in good faith to answer the questions without the need for further formal or informal discovery.
- 4. DESC's must prefile any rebuttal testimony and exhibits of the witnesses it intends to present and serve the testimony and exhibits of the witnesses on all Parties of Record on or before **December 8**, **2020**.
- 5. Any Party of Record wishing to file any motion regarding discovery matters is required to do so no later than **December 11, 2020**.
- 6. All Other Parties of Record and ORS must prefile any surrebuttal testimony and exhibits of the witnesses they intend to present and serve the testimony and exhibits of the witnesses on all Parties of Record on or before **December 15, 2020.**
- 7. A hearing on the merits will begin on **January 5**, **2021**, and continue thereafter until completed.
- 8. Any Party of Record who wishes to file a post-hearing brief and/or proposed order may do so no later than **January 25, 2021**.
- 9. An Order will be issued by the Commission by February 15, 2021.
- 10. DESC Rates will be effective on March 8, 2021.

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Lastly, the Company and ORS are in agreement that DESC will maintain the historical test period as the twelve-months ended December 31, 2019, and that the Company will update its test period results for known and measurable matters as of September 30, 2020.

Thank you for your attention to our request both as to the prefiling schedule and for a clarification of the Commission's understanding of the effect of Order No. 2020-313. Please let us know as soon as possible if the Company is operating under a misreading of Order No. 2020-313 and its provisions vacating all mandatory filing and rate-related deadlines.

If you have any questions or need additional information from us regarding these matters, please do not hesitate to contact us.

Very truly yours,

K. Chad Burgess

KCB/kms

cc: All Parties of Record in Docket Nos. Docket No. 2017-207-E; Docket No. 2017-305-E; Docket No. 2017-370-E; Docket No. 2020-106-A; and Docket No. 2020-125-E

(all via electronic mail only)